

Oregon Nonpoint Source Management Plan – Key Components critique

- 1. The state program contains explicit short- and long-term goals, objectives and strategies to restore and protect surface water and ground water, as appropriate.**
 - a. Needs more specific milestones (e.g. number of WQ-10 stories per year or the number of high priority watersheds in which projects are being implemented).
- 2. The state strengthens its working partnerships and linkages to appropriate state, interstate, tribal, regional, and local entities (including conservation districts), private sector groups, citizens groups, and federal agencies.**
 - a. The plan mentions many partnerships though it could be better organized.
- 3. The state uses a combination of statewide programs and on-the-ground projects to achieve water quality benefits; efforts are well-integrated with other relevant state and federal programs.**
 - a. Does discuss many programs (e.g. TMDLs, groundwater, drinking water, pesticides, CZARA, etc.).
 - b. Does not discuss some programs/issues such as CAFOs, wetlands, climate change planning, etc. In fact, the entire plan only refers to climate change twice.
- 4. The state program describes how resources will be allocated between (a) abating known water quality impairments from NPS pollution and (b) protecting threatened and high quality waters from significant threats caused by present and future NPS impacts.**
 - a. Does mentions that high quality waters are prioritized in local/basin planning process.
 - b. Does not describe how basin planning groups will go about identifying particular waters.
- 5. The state program identifies waters and watersheds impaired by NPS pollution as well as priority unimpaired waters for protection. The state establishes a process to assign priority and to progressively address identified watersheds by conducting more detailed watershed assessments, developing watershed-based plans and implementing the plans.**
 - a. Does describe 303d and 305b.
 - b. Does list a set of documents that help prioritize future work.
 - c. Does not identify primary categories and subcategories causing the impairments.
- 6. The state implements all program components required by section 319(b) of the Clean Water Act, and establishes strategic approaches and adaptive management to achieve and maintain water quality standards as expeditiously as practicable. The state reviews and upgrades program components as appropriate. The state program includes a mix of regulatory, nonregulatory, financial and technical assistance, as needed.**

- a. Does not include a complete list of measures/BMPs
 - i. Does include a list of BMPs for federal roads
 - ii. Does reference USFS's National Core BMPs technical guide but goes on to say that the BMPs in the technical guide "are deliberately general and non-prescriptive. As this document is national in scope it cannot address all possible practices.....". I think that OR's plan should list or reference guides containing specific/prescriptive BMPs.
- b. Does identify key programs that are involved in achieving implementation of measures.
- c. Does not include a schedule with goals, objective and specific annual milestones
- d. Does discuss various funding sources other than 319
- e. Does discuss federal land mgmt programs
- f. Does briefly mention monitoring efforts to evaluate program effectiveness.

7. The state manages and implements its NPS management program efficiently and effectively, including necessary financial management.

- a. Does describe how federal funds are being used in DEQ (FTE positions and what these positions are working on) and given as grants to fund TMDL implementation plans, monitoring, demonstration of BMPs, public outreach/education, etc.

8. The state reviews and evaluates its NPS management program using environmental and functional measures of success, and revises its NPS management program at least every five years.

- a. Does mention updating the plan every 5 years.
- b. Does not establish (at least that I could find) measures of progress
- c. Does not appear to have a monitoring/evaluation strategy and schedule. They do mention current future monitoring efforts.